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PACE Anti-Piracy, Inc.

11 || UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA

13 || OAKLAND DIVISION

14 PACE ANTI-PIRACY, INC. a California  
corporation,

CASE NO. 4:17-cv-05860-HSG

**STIPULATION AND ORDER FOR  
CONTINUANCE OF INITIAL CASE  
MANAGEMENT CONFERENCE AND  
ACCOMPANYING DEADLINES**

17 INSIDE SECURE, a French legal entity, and  
18 INSIDE SECURE CORP., a Delaware  
corporation,

Defendant.

## **STIPULATION**

This Stipulation is made pursuant to Local Rule 6-2 by and between Plaintiff PACE Anti-Piracy, Inc. (“PACE”) and Defendants Inside Secure and Inside Secure Corp. (collectively, “IS”) through their respective attorneys. PACE and IS (collectively, the “Parties”) stipulate as follows:

1. The Court's Order Setting Initial Case Management Conference and ADR Deadlines dated October 12, 2017 ("Initial CMC Order") set an initial case management conference in this case for January 12, 2018 at 2:00 p.m. ("Initial CMC"), and directed counsel to meet and confer regarding their respective Rule 26(f) obligations in advance of the CMC no later than December 22, 2017. (Dkt. No. 7).

2. The Court's Initial CMC Order also stated that, under Rule 26(f), initial disclosures must be made at or within fourteen (14) days after the Rule 26(f) conference, or by January 5, 2018.

3. On December 1, 2017, this case was reassigned to the Honorable Haywood S. Gilliam, Jr. (“Order Reassigning Case”). The Order Reassigning Case vacated the Initial CMC, but kept all other deadlines, such as those for ADR compliance, in place. (Dkt. No. 29).

4. Also on December 1, 2017, the Initial CMC was re-scheduled for January 16, 2018 at 2:00 p.m., with the deadline to meet and confer re-scheduled to December 26, 2017 and the deadline for the filing of the Case Management Conference Statement re-scheduled to January 9, 2018. (Dkt. No. 28).

5. There have been no previous time modifications in this case except for two extensions of time for IS to respond to PACE's complaint; that response is due on December 26, 2017. (Dkt. Nos. 20 and 31).

6. The Parties have engaged in face-to-face settlement discussions and have exchanged proposed settlement terms. While the Parties are still negotiating those terms, the Parties request this continuance of the Case Management Conference Schedule deadlines as set out below so that they can continue settlement negotiations in the hope that this case can be settled prior to the below proposed January 16, 2018 deadline.

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7. The Parties have agreed to modify the Case Management Conference Schedule as follows:

## CASE MANAGEMENT CONFERENCE SCHEDULE

Date	Event	Governing Rule
January 16, 2018	Last day to meet and confer re: initial disclosures and discovery plan	FRCP 26(f)
January 30, 2018	Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement  (also available at <a href="http://www.cand.uscourts.gov">http://www.cand.uscourts.gov</a> )	FRCP 26(a)(1)  Civil L.R. 16-9
February 6, 2018, at 2:00pm	INITIAL CASE MANAGEMENT CONFERENCE (CMC):  Oakland Courthouse Courtroom 2 - 4th Floor 1301 Clay Street, Oakland, CA 94612	Civil L.R. 16-10

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: December 20, 2017

## HOPKINS & CARLEY, A Law Corporation

By: /s/ John Picone  
John V. Picone III

Attorney for Plaintiff PACE Anti-Piracy, Inc.

Dated: December 20, 2017

SKADDEN, ARPS, SLATE, MEAGHER & FLOM  
LLP

By: /s/ James Pak  
James Y. Pak

Attorney for Defendants Inside Secure and  
Inside Secure Corp.

## ATTESTATION OF E-FILED SIGNATURE

Pursuant to Local Rule 5-1(i)(3), I hereby certify that I have obtained the concurrence in the filing of this document from all signatories for whom a signature is indicated by a "conformed" signature (/ s /) within this electronically filed document and I have on file records to support this concurrence for subsequent production to the Court if so ordered or for inspection upon request.

Dated: December 20, 2017

By: /s/ John Picone

John V. Picone III  
Attorney for Plaintiff  
PACE Anti-Piracy, Inc.

## **ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: DECEMBER 21, 2017

By:

Haywood S. Gilliam, Jr.  
HON. HAYWOOD S. GILLIAM, JR.

HON. HAYWOOD S. GILLIAM, JR.  
UNITED STATES DISTRICT JUDGE